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July 12, 2023

**By ECF and Email**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

Re: *Altana Credit Opportunities Fund SPC et al. v. Bolivarian Republic of Venezuela*,  
No. 1:20-cv-8402-AT [rel. 1:19-cv-3123-AT]  
Request for Extension Regarding Fees and Costs

Dear Judge Torres,

Plaintiffs Altana Credit Opportunities Fund SPC, Altana Credit Opportunities Fund 1 SP,  
and Altana Funds Ltd. Cayman respectfully submit this letter regarding the Court's Order  
granting Plaintiffs' motion for default judgment. Dkt. 72. The Court ordered as follows:

By **July 19, 2023**, Plaintiffs shall submit an updated proposed default judgment  
that reflects the amounts due as of the date the proposed default judgment is  
entered. By **July 19, 2023**, Plaintiffs may also file contemporaneous billing  
records and other documented expenses in support of an award of fees and costs.

*Id.* at 6-7. As directed, Plaintiffs will submit their updated proposed default judgment by  
July 19.

As for the award of fees and costs, Plaintiffs respectfully request an extension of  
the deadline to submit contemporaneous billing records and other documented expenses  
from July 19, 2023, until 30 days after the Court's entry of the final default judgment.

This limited extension will permit Plaintiffs to include the most updated figure and  
contemporaneous records in support of an award of fees and costs, and would come at no  
prejudice to Defendant, who has not appeared in this case. Plaintiffs respectfully submit

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that this requested extension with respect to fees and costs should not affect the Court's entry of final default judgment.

Sincerely,

/s/ David W. Bowker  
David W. Bowker

GRANTED.

SO ORDERED.

Dated: July 13, 2023  
New York, New York



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ANALISA TORRES  
United States District Judge